

# EXHIBIT W

1 UNITED STATES DISTRICT COURT  
2 CENTRAL DISTRICT OF CALIFORNIA  
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4 THE WIMBLEDON FUND, SPC (CLASS )  
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PLAINTIFFS,

VS.

CASE NO.  
2:15-CV-6633-CAS-ASJWx

GRAYBOX LLC; INTEGRATED  
ADMINISTRATION; EUGENE SCHER, AS  
TRUSTEE OF BERGSTEIN TRUST; AND  
CASCADE TECHNOLOGIES CORP.,

DEFENDANTS.

16 VIDEOTAPED DEPOSITION OF KIARASH JAM, 30(B)(6) taken on  
17 behalf of the Plaintiff, at 10100 Santa Monica Boulevard,  
18 13th Floor, Los Angeles, California, commencing at  
19 9:57 a.m., Thursday, March 28, 2019, before Sandra Mitchell,  
20 C.S.R. 12553, pursuant to Notice.

10:26:02 1 these individual transactions from back then.

2 Q Okay. Do you know if Integrated Administration  
3 provided any goods or services to Swartz IP Services?

4 A Integrated Administration had 40 employees. I  
10:26:21 5 don't know in, on, or around this time, and David was  
6 doing a lot of work with and Jerry Swartz, and I don't  
7 know what David was or wasn't doing. Whatever he was  
8 doing, as far as I'm concerned, he was doing stuff for a  
9 multitude of companies, potentially including Swartz IP.

10:26:35 10 So that's my thought.

11 Q Okay. Do you know if any of Integrated  
12 Administration's 40 employees were doing work for Swartz  
13 IP?

14 A I don't know what a lot of the employees were  
10:26:48 15 doing. I could tell you that there were 40 employees.  
16 Some were housed, not with us, at other places working  
17 on the medical billing. So the medical billing was a  
18 business that uh, um, uh, was -- had a bunch of  
19 employees, and there was other things that David was  
10:27:02 20 doing. I don't what some of David's people were working  
21 on. Maybe they were working on things for Swartz IP. I  
22 don't know.

23 Q Okay. But did -- you understood that Swartz IP  
24 was not a medical billing; did you?

10:27:15 25 A Swartz IP was a company that was funding

10:27:16 1 things. I don't know specifically what was it doing. I  
2 did not form it. I did not run. I don't know  
3 specifically what it was set up to do.

4 Q Okay. But Integrated Administration was your  
10:27:25 5 company?

6 A That is correct.

7 Q Okay. So when this payment of \$150,000 hit  
8 Integrated Administration's bank account on  
9 November 23rd, 2011, did you question where it came from  
10:27:39 10 or why you were receiving it?

11 A I would -- David would be funding the company.  
12 You will see a lot of wires that came in that he  
13 arranged. I would tell him the company's financial  
14 needs were in terms of how much was needed for payroll,  
10:27:51 15 for bills, for rent, for phones, et cetera, and he would  
16 arrange money to come in. And I would ask him what the  
17 money was, and how it should be logged, and that was our  
18 routine. It was my routine.

19 Q But it's your testimony that you're not aware  
10:28:03 20 of any, goods or services that Integrated Administration  
21 provided Swartz IP in exchange for this payment?

22 A No, that's not what I said. What I said is, I  
23 don't know what David was doing with them. Maybe David  
24 was providing the goods and services for them, maybe he  
10:28:21 25 was consulting for them, maybe he was working on deals.

10:28:21 1 I don't know what he was doing.

2 Q But you're not aware one way or the other?

3 A I'm not aware of what he was doing.

4 Q Okay.

10:28:31 5 A I'm not aware of what he was doing.

6 Q Okay. Are you aware of whether Integrated  
7 Administration issued an invoice related to this payment  
8 from Swartz IP?

9 A There were some invoices issued. I don't  
10:28:52 10 remember specifically what for, or how many, or when.

11 Q Okay. Are you aware of any documents relating  
12 to the purpose or reason why this \$150,000 was paid from  
13 Swartz IP to Integrated Administration?

14 A I don't know what David had with Swartz IP.  
10:29:08 15 Maybe it's something that he did. He had paperwork. He  
16 made a deal with them. I don't know the answer to that.

17 Q Okay. Let's turn to the next page, page 18.

18 A Okay.

19 Q And the first transaction dated November 29,  
10:29:19 20 2011.

21 Do you see that?

22 A Yes, I do.

23 Q And that's another payment from Swartz IP  
24 Services Group to Integrated Administration.

10:29:26 25 Do you agree with me?

10:29:27 1 A I do.

2 Q Okay. And do you have an understanding as to  
3 why this payment was made?

4 A No. No. I talked about this yesterday to the  
10:29:37 5 same statement I made yesterday.

6 Q Okay. And is it the same statement that you  
7 just made to me before, and that's that you really don't  
8 know one way or the other why this payment was made or  
9 whether -- strike that.

10:29:50 10 You really don't know one way or the other  
11 whether Integrated Administration provided any goods or  
12 services to Swartz IP in exchange for this payment?

13 A What I know is that David would fund IA, and  
14 I'll say that again. I've said it a few times. David  
10:30:05 15 would arrange funding to come in to IA for the work IA  
16 was doing. I was not involved in where the money would  
17 come from, or how the money would come in. He would  
18 arrange the wires, as you see. The wires would come in  
19 and he would tell me what to do with the money.

10:30:20 20 Q And you would do as he told you?

21 A Yes.

22 Q Okay. Did you ask any questions?

23 A I would ask how to classify it so that I could  
24 keep our books and records clean.

10:30:30 25 Q Did you ask any questions as to the source of

11:15:11 1 Q And I want to direct you to three transactions  
2 on this page, July 2nd, July 11th, and July 13th.

3 Let's look at the first one July 2nd, 2012, a  
4 \$200,000 transfer from Advisory IP Services to  
11:15:31 5 Integrated Administration.

6 Do you see that?

7 A I do. I see all three of them.

8 Q Okay. Now, with respect to this first one,  
9 again, you're not aware any goods or services that  
11:15:42 10 Swartz IP provided to Integrated Administration in  
11 exchange for this payment?

12 A My answer's going to be the same.

13 Q And you don't know the purpose of this payment?

14 A My answer's going be the same.

11:15:53 15 Q Which is that you don't know the purpose of the  
16 payment?

17 A You've asked me the same question now ten  
18 times. My answer is the same.

19 Q I'm -- I have asked you the same question --

11:16:02 20 A Yeah.

21 Q -- but I'm referring to specific transfers.

22 A Right. And I could tell you this -- these  
23 three transaction --

24 Q Uh-huh.

11:16:04 25 A -- my answer's the same as I have for the last

11:16:08 1 ten transactions that you've shown me.

2 Q Okay. And to be clear, you don't know the  
3 purpose for the transfers?

4 A I don't know what David was doing, but David  
11:16:14 5 was arranging this funding in. I don't know what he was  
6 working on, but David Bergstein arranged the funds to  
7 come in. He was in control of the Swartz IP company and  
8 accounts.

9 Q Okay. And you're not aware of any documents or  
11:16:24 10 records that would refresh your recollection as to the  
11 purpose --

12 A I don't know what had David internally. As I  
13 said, I don't know what documents David had, so I don't  
14 know.

11:16:38 15 Q Okay. Let's look at what I've marked as  
16 Exhibit 6.

17 A Put this away?

18 Q Yes.

19 (Exhibit 6 was marked for  
11:16:59 20 identification by the Court Reporter  
21 and is attached hereto.)

22 BY MR. LATZER:

23 Q And this is an e-mail from you to  
24 Mr. Zarrinkelk's employee --

11:17:13 25 A Yes.